

Exhibit F

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
HUNTINGTON DIVISION**

Jonathan R., minor by Next)	
Friend Sarah DIXON, <i>et al.</i> ,)	
)	
<i>Plaintiffs,</i>)	
v.)	Case No. 3:19-cv-00710
)	
Jim JUSTICE, in his official capacity as)	
the Governor of West Virginia, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	

PLAINTIFFS' THIRD AMENDED SUPPLEMENTAL RULE 26(a)(3) DISCLOSURES

Plaintiffs, through counsel, submit their amended pretrial disclosures under Federal Rule of Civil Procedure 26(a)(3) and the Court's scheduling order. ECF No. 491.

FRCP 26(a)(3)(A)(i)—The name and, if not previously provided, the address and telephone number of each witness—separately identifying those the party expects to present and those it may call if the need arises.

Plaintiffs expect to call the following witnesses at trial, some of whom will be sent a third-party subpoena for testimony.

1. Bill Crouch
2. Carrie Jackson
(681) 460-6802
[REDACTED]
Charleston, WV [REDACTED]
3. Debora Pigman
(859) 230-4084
[REDACTED]
Moorehead, KY [REDACTED]
4. Elizabeth Layne Diehl, Esq.
(304) 268-8832
[REDACTED]
Martinsburg, WV [REDACTED]

5. Gordon Simmons
(304) 395-6294
[REDACTED]
Charleston, WV [REDACTED]
6. Heather Dalton
(304) 698-2606
[REDACTED]
Moatsville, WV [REDACTED]
7. Jeffrey Pack
1900 Kanawha Boulevard, East
Charleston, WV 25305
(304) 558-3317
8. Jennifer Taylor, Esq.
(304) 342-1887
1118 Kanaugh Blvd. East
Charleston, WV 25314
9. Jeremiah Samples
c/o Robert Leslie
(304) 357-3357
WV House of Delegates
House Counsel
10. Jessica Combs
(304) 722-3962
[REDACTED]
St. Albans, WV [REDACTED]
11. Kathie Giboney
(304) 299-2811
[REDACTED]
St. Mary's, WV [REDACTED]
12. Dr. Lisa Prock
(617) 355-4125
Boston Children's Hospital
300 Longwood Avenue
Boston, MA 02215
13. Marissa Sanders
(304) 993-2885
[REDACTED]

Roseville, MN [REDACTED]

14. Melanie Urquhart
350 Capitol Street, Suite 718
Charleston, WV 25301
(304) 792-7095

15. Samuel Hickman
(304) 541-1398 cell
[REDACTED]
Charleston, WV [REDACTED]

16. Sarah Cody
681-702-5292
[REDACTED]
Gerrardstown, WV [REDACTED]

17. Stacy Jacques
(304) 767-4369

18. Stephanie Williams
(304) 520-9340
163 Cottage Drive
Lewisburg, WV 24901

19. Susan Ault
(651) 226-0184
[REDACTED]
Duluth, MN [REDACTED]

20. Olivia Frausto
(681) 446-0170
[REDACTED]
Martinsburg, WV [REDACTED]

Plaintiffs may call the following witnesses at trial, some of whom will be sent a third-party subpoena for testimony.

21. Araina Moore
(304) 582-5641
[REDACTED]
Martinsburg, WV [REDACTED]

22. Brittany Payne
(202) 277-3727
[REDACTED]
Talcott, WV [REDACTED]
23. Cammie Chapman
One Davis Square, Suite 100 East
Charleston, WV 25301
(304) 558-0628
24. Charla Cody
(304) 279-0992
[REDACTED]
The Villages, FL [REDACTED]
25. Cynthia A. Persily, Ph.D.
One Davis Square.
Charleston, WV 25301
(304) 558-0684
26. Erin Suh
(646) 795-4456
355 Lexington Avenue Floor 16
New York, NY 10017
27. Kim Ricketts
350 Capitol Street
Charleston, WV 25301
(304) 352-4493 (phone)
28. Timothy Reynolds
(304) 575-9117
163 Cottage Drive
Lewisburg, WV 24901

Any and all persons with relevant knowledge who have not yet been identified, any necessary rebuttal witnesses, and Plaintiffs reserve the right to supplement and/or amend this list.

FRCP 26(a)(3)(A)(ii)—The designation of those witnesses whose testimony the party expects to present by deposition and, if not taken stenographically, a transcript of the pertinent parts of the deposition.

Depending on Defendants' proposed witnesses, Plaintiffs may offer the deposition testimony of other deponents, including all current and former employees of the Department of Health and Human Resources, the Department of Human Services, the Bureau of Social Services, or the Bureau of Children and Families.

FRCP 26(a)(3)(A)(iii)—An identification of each document or other exhibit, including summaries of other evidence—separately identifying those items the party expects to offer and those it may offer if the need arises.

Plaintiffs expect to offer at trial the following exhibits:

Victor v. West Virginia Department of Health and Human Resources January 6 Hearing Transcript (January 6, 2022), ECF 318-3

Jeremiah Samples, Leader Status Report: DHHR Reorganization RFP Analysis (May 31, 2022)

Terra Alta Children's Home Recertification, Life Safety Code Survey (January 23, 2023), available at <https://ohflac.wvdhhr.org/Apps/Lookup/FacilityDetails/28516>

DHHR, DHHR Unveils Major New Initiative to Strengthen Protective Services (January 24, 2023), available at <https://dhhr.wv.gov/News/2023/Pages/DHHR-Unveils-Major-New-Initiative-to-Strengthen-Protective-Services.aspx#:~:text=As%20of%20December%2031%2C%202022,need%20of%20these%20critical%20services.%E2%80%9D>

Terra Alta Children's Home Recertification Survey (January 26, 2023), available at <https://ohflac.wvdhhr.org/Apps/Lookup/FacilityDetails/28516>

Terra Alta Children's Complaint Survey (March 29, 2023), available at <https://ohflac.wvdhhr.org/Apps/Lookup/FacilityDetails/28516>

WV DHHR, WV Child and Family Services Review Program Improvement Plan (March 31, 2023)

Affidavit of Commissioner Jeffrey Pack, *Victor v. West Virginia Department of Health and Human Resources* (May 16, 2023). ECF 318-4.

Highland Hospital Complaint Survey (September 13, 2023), available at <https://ohflac.wvdhhr.org/Apps/Lookup/FacilityDetails/149045>

Terra Alta Children's Home Recertification, Life Safety Code Survey (December 12, 2023), available at <https://ohflac.wvdhhr.org/Apps/Lookup/FacilityDetails/28516>

Terra Alta Children's Home Recertification Survey (December 14, 2023), available at <https://ohflac.wvdhhr.org/Apps/Lookup/FacilityDetails/28516>

Doc 3 of May 14th, 2024 Production of Jeremiah Samples Documents (Jeremiah Samples, Legislative Oversight of Health and Human Services (April 20, 2022))

Doc 4 of May 14th, 2024 Production of Jeremiah Samples Documents (Proposed Solutions: Child Welfare Crisis (November 5, 2023))

Doc 5 of May 14th, 2024 Production of Jeremiah Samples Documents (Jeremiah Samples, Department of Human Services: A Statistical and Programmatic Overview (April 18, 2023))

Doc 7 of May 14th, 2024 Production of Jeremiah Samples Documents (Questions about McChrystal Report)

Doc 8 of May 14th, 2024 Production of Jeremiah Samples Documents (Jeremiah Samples, Leadership Report: DHHR Reform and Analysis (December 12, 2022))

Doc 9 of May 14th, 2024 Production of Jeremiah Samples Documents (West Virginia Legislature Joint Committee on Government and Finance DHHR Strategic Reform Update)

Doc 10 of May 14th, 2024 Production of Jeremiah Samples Documents (Jeremiah Samples, Leadership Report: Overview of Health Care and Human Service Legislation (March 13, 2023))

Doc 19 of May 14th, 2024 Production of Jeremiah Samples Documents (Spreadsheet of Improvement Measures)

Doc 21 of May 14th, 2024 Production of Jeremiah Samples Documents (Jeremiah Samples, Foster Parent Communication Portal: Improving Communications and Driving Accountability (December 5, 2022))

Doc 25 of May 14th, 2024 Production of Jeremiah Samples Documents (Jeremiah Samples, Leadership Status Report: DHHR Reform Proposal (November 28, 2022))

Doc 29 of May 14th, 2024 Production of Jeremiah Samples Documents (Jeremiah Samples, Remaking West Virginia: A New Era in Dignity and Welfare Policy (November 20, 2022))

West Virginia Child Welfare Dashboard (July 2024), <https://dhhr.wv.gov/Pages/childwelfareadatadashboard.aspx>

BSS, Child Protective Services Workforce Allocations Calendar Year 2024 (July 1, 2024), available at http://www.wvlegislature.gov/legisdocs/reports/agency/H16_CY_2024_26394.pdf

OSRI Reports completed after 2023, DPQI: D002760171, D002760184, D002760184, D002779805, D002212906, D002233829, D002779791, D002779689, D002212875, D002212886, D002212854, D002779664, D002779752, D002779710, D002779677, D002760131, D002233792, D002760077, D002760099, D002212875, D002212886, D002760114, D002233886, D002212854, D002212865, D002212799, D002760236, D002779728, D002233864, D002760149, D002212822, D002212833, D002779818, D002233910, D002233899, D002233779, D002233846, D002760218, D002233814, D002212939, D002233928, D002212918, D003114460, D003114509, D003114375, D003114427, D003114395, D003105954, D003106160, D003106086, D003114490, D003106043, D003106076, D003106120, D003105990, D003105880, D003106023, D003114472, D003106058, D003106137, D003105785, D003106149, D003114520, D001274011, D001273999, D001274063, D001243380, D001243890, D001243938, D001244001, D001273916, D001274044, D001243129, D001242762, D001273928, D001243860, D001244556, D001244484, D001242975, D001244727, D001273979,

D001244638, D001242871, D001244755, D001244777, D001244767, D001243073,
D001243476, D001274024, D001244497, D001243846, D001243347, D001242684,
D001244319, D001244227, D001243948, D001243984, D001243874, D001243922,
D001244280, D001243232, D001243806, D001243006, D001243288, D001244739,
D001243245, D001244098, D001243306, D001243306, D001243578, D001243361,
D001243113, D001245792, D001243503, D001244619, D001243683, D001244374,
D001244374, D001243619, D001243619, D001244208, D001243209, D001245951,
D001251506, D001243146, D001243902, D001244295, D001243414, D001242699,
D001244509, D001244698, D001243489, D001243721, D001244241, D001242798,
D001243437, D001243753, D001242910, D001244712, D001243965, D001242910,
D001244712, D001243965, D001243163, D001242989, D001243518, D001243163,
D001244256, D001244011, D001244351, D001242951, D001243049, D001244161,
D001243633, D001244438, D001243185, D001242621, D001243325, D001243262,
D001244528, D001242819, D001242885, D001243023, D001242773, D001243736,
D001244461, D001243396, D001244652, D001244071, D001244388, D001242714,
D001244185, D001242738, D001244675, D001244591, D001243697, D001243697,
D001244137, D001243656, D001243087, D001243593, D001244412, D001243821,
D001243780, D001242643, D001244412, D001243821, D001243780, D001242643,
D001244567, and D001243451

Caseload Data between June 2014-July 2024: D210034, D210037, D210030, D210035, D210033,
D210036, D144564, D210029, D144565, D210032, D219797, D219814, D144566, D210031,
D219793, D219819, D144563, D146248, D219796, D219817, D146246, D146247, D219798,
D219813, D146245, D146249, D219795, D219812, D219799, D219810, D219794, D219815,
D219800, D219816, D001937440, D219792, D219818, D219811, D22765, D001937441,
D001937440, D003113462

D003776 – US DHHS, West Virginia Final Report (2017)

D003816 - DHHR, West Virginia 2019 Child and Family Services Plan (2019)

D004703 - DHHR, Fourth Annual Progress Report (2018)

D010411 – DHHR, Consent for Release of Information Form (January 6, 2020)

D023347 – Out of State Placement Face Sheet (March 6, 2019)

D029389 – DHHR, Client Placement History Report (January 9, 2020)

D068521 - Email from Jessica Holstein to Kent Nowviskie, Janie Cole, and Linda Watts
copying others (January 29, 2019)

D209023 – BSS DPQI, Kanawha District Child and Families Services Review (CFSR)
Exit Report (May 5, 2020)

D209057 – BSS DPQI, Berkeley/Jefferson/Morgan District Child and Families Services
Review (CFSR) Exit Report (August 10, 2020)

D209098 – BSS DPQI, Fayette District Child and Families Services Review (CFSR) Exit Report (December 17, 2020)

D209111 – BSS DPQI, Wood District Child and Families Services Review (CFSR) Exit Report (January 25, 2020)

D209131 – BSS DPQI, Marion/Monongalia District Review Child and Families Services Review (CFSR) Exit Report (April 27, 2020)

D209170 – BSS DPQI, Ritchie/Pleasants/Doddridge District Child and Families Services Review (CFSR) Exit Report (February 24, 2020)

D209187 – BSS DPQI, Calhoun/Gilmer/Wirt District Child and Families Services Review (CFSR) Exit Report (September 17, 2020)

D209199 – BSS DPQI, Greenbrier/Monroe/Pocahontas/Summers District Child and Families Services Review (CFSR) Exit Report (October 23, 2020)

D209239 – BSS DPQI, Mingo District Child and Families Services Review (CFSR) Exit Report (March 20, 2020)

D209252 – BSS DPQI, Grant/Hardy/Pendleton District Child and Families Services Review (CFSR) Exit Report (June 4, 2020)

D209289 – BSS DPQI, Jackson Roane Clay District Child and Families Services Review (CFSR) Exit Report (October 26, 2018)

D209303 – BSS DPQI, Kanawha District Child and Families Services Review (CFSR) Exit Report (May 21, 2018)

D209317 – BSS DPQI, Wyoming District Child and Families Services Review (CFSR) Exit Report (May 10, 2018)

D209327 – BSS DPQI, Berkeley/Jefferson/Morgan District Child and Families Services Review (CFSR) Exit Report (February 28, 2018)

D209370 – BSS DPQI, Fayette District Child and Families Services Review (CFSR) Exit Report (July 9, 2018)

D209383 – BSS DPQI, Wood County District Child and Families Services Review (CFSR) Exit Report (August 7, 2018)

D209418 – BSS DPQI, Nicholas Webster District Child and Families Services Review (CFSR) Exit Report (January 7, 2019)

D209431 – BSS DPQI, Lincoln/Boone District Child and Families Services Review (CFSR) Exit Report (December 7, 2018)

D209447 – BSS DPQI, Calhoun/Gilmer/Wirt District Child and Families Services Review (CFSR) Exit Report (March 22, 2018)

D209459 – BSS DPQI, Putnam/Mason District Child and Families Services Review (CFSR) Exit Report (September 18, 2018)

D209474 – BSS DPQI, Barbour/Preston/Taylor County District Child and Family Services Review (CFSR) Exit Report (October 22, 2018)

D209510 – BSS DPQI, GMPS District Child and Families Services Review (CFSR) Exit Report (May 15, 2018)

D209522 – BSS DPQI, Marshall/Tyler/Wetzel District Child and Families Services Review (CFSR) Exit Report (July 17, 2019)

D209535 – BSS DPQI, Kanawha District Child and Families Services Review (CFSR) Exit Report (June 18, 2019)

D209554 – BSS DPQI, Cabell County District Child and Families Services Review (CFSR) Exit Report (March 1, 2019)

D209573 – BSS DPQI, Wayne District Child and Families Services Review (CFSR) Exit Report (September 3, 2019)

D209603 – BSS DPQI, Randolph/Tucker District Child and Families Services Review (CFSR) Exit Report (January 6, 2020)

D209617 – BSS DPQI, McDowell District Child and Families Services Review (CFSR) Exit Report (January 7, 2020)

D209642 – BSS DPQI, Logan District Child and Families Services Review (CFSR) Exit Report (March 26, 2019)

D209658 – BSS DPQI, Ohio/Brooke/Hancock District Child and Families Services Review (CFSR) Exit Report (December 16, 2019)

D209672 – BSS DPQI, Raleigh District Child and Families Services Review (CFSR) Exit Report (October 9, 2019)

D209732 – BSS DPQI, Harrison County District Child and Families Services Review (CFSR) Exit Report (September 18, 2019)

D209750 – BSS DPQI, Hampshire/Mineral District Child and Families Services Review (CFSR) Exit Report (May 31, 2019)

D146265 – Mission West Virginia Kinship Navigator Program, “The First Year” (January 4, 2021)

D218763 – DHHR, West Virginia Foster Care Ombudsman Program State Fiscal Year 2022 ~ 2nd Quarter Report (December 31, 2021)

D218772 - DHHR, West Virginia Foster Care Ombudsman Program State Fiscal Year 2022 ~ 3rd Quarter Report (March 31, 2022)

D218781 - DHHR, West Virginia Foster Care Ombudsman Program State Fiscal Year 2021: Quarterly Reports (June 30, 2021)

D218788 – BSS, West Virginia 2023 Annual Progress and Services Review (2023)

D239629 - Totals for Youth in Offices or Hotels Per Month (January 2019)

D282515 – Email from Kellie Littlefield to Jeffrey Pack and others (July 14, 2022)

D282516 – Attachment to email from Kellie Littlefield to Jeffrey Pack and others (July 14, 2022)

D285200 - Foster Care Placements Report (July 2020)

D292200 – Email from Angela Ferris to Cynthia Persily (August 16, 2023)

D292207 – Attachment to email from Angela Ferris to Cynthia Persily (August 16, 2023)

D292230 – Attachment to email from Angela Ferris to Cynthia Persily (August 16, 2023)

D292234 – Attachment to email from Angela Ferris to Cynthia Persily (August 16, 2023)

D304403 - Children in Hotels and Hospitals Judicial District Summary Monthly Report for February 1-February 28, 2022

D304425: Children in Hotels and Hospitals Judicial District Summary Monthly Report for May 1-May 30, 2022

D329935 – Email from Tanny O’Connell to Amy Hymes (August 23, 2021)

D342616 – Email from Tanny O’Connell to Amy Hymes and others (March 17, 2021)

D352523 - Email from Brittany Harris to Amanda Spencer, copying others (November 9, 2021)

D366732 – Email from Laurea Ellis to Brandis Bragg and others (September 6, 2021)

D366734 – Investigation Workload Distribution Report (September 30, 2021)

D366735 – Open Referrals Over 30 Days Report (September 6, 2021)

D366737 – Current Month Caseworker Visits data (September 6, 2021)

D383297 - Email from Jeffrey Pack to Melanie Urquhart, copying Amanda Queen (August 21, 2023)

D382942 - Email from Lorie Bragg to Laurea Ellis, copying Michelle Dean and Jeffrey Pack (August 28, 2023)

D382959 - Email from Michelle Dean to Lorie Bragg, copying Laurea Ellis and Jeffrey Pack (August 25, 2023)

D383845 - Email from Michelle Dean to Jeffrey Pack (August 7, 2023)

D384744 - Email from Jondrea Nicholson to Jeffrey Pack, copying Laurea Ellis (April 7, 2023)

D384771 – Email from Meaghan Goffreda to Jeffrey Pack, Melanie Urquhart, and others (April 6, 2023)

D388075 – Email from Jeffrey Pack to Laurea Ellis and Amanda Queen (July 5, 2023)

D388079 – Policy Memorandum 2102: Hours of Work/Overtime from DHHR to Office of the Secretary (November 6, 2020)

D388129 – Email from Jeffrey Pack to Laurea Ellis, Melanie Urquhart, and Amanda Queen (June 23, 2023)

D391067 - Email from Roann Bosley to Jeffrey Pack and Laurea Ellis (July 24, 2023)

D396776 - Email from Melanie Urquhart to Lorie Bragg, copying Jeffrey Pack, Michelle Dean, and Terri Miller (February 10, 2023)

D401004 – BSS, State Personnel Board Proposal Review Summary (January 23, 2023)

D403710 – Email from Tanny O’Connell to Linda Watts and Jeremiah Samples and copying others

D405277 – Email from Cynthia Beane to Jeremiah Samples, Linda Watts, and others (April 13th, 2021)

D405651 – Email from Jeremiah Samples to Stephanie Bond (April 19, 2021)

D410967 – Email from Jeremiah Samples to Pamela Woodman Kaehler (July 1, 2021)

D419988 – Email from Jeremiah Samples to Pamela Woodman Kaehler (October 29, 2021)

D428774 – Aetna Report: Requests of Jerimiah and Individualized Reviews (April 22, 2023)

D429865 – Email from Jeremiah Samples to Angela Ferris, copying Bill Crouch, Jeffrey Pack, and Tara Buckner (March 11, 2022)

D432346 – Email from Jeremiah Samples to Jeremiah Samples (January 11, 2022)

D535701 - Email from Kandy Pudsell to Rick Parks, copying Laurea Ellis and others (July 13, 2023)

D546066 - Email from Amy Hymes to Laurea Ellis, Jeffrey Pack, Melanie Urquhart, and others (May 22, 2022)

D590189 - Email from Lorie Bragg to William Belcher (September 30, 2021)

D590190 – Attachment to email from Lorie Bragg to William Belcher (September 30, 2021)

D659731 - Email from Beverly Heldreth to Travis McReynolds, copying others (June 27, 2023)

D763507 – Email from Bill Crouch to Pamela Allen (May 24, 2022)

D792203 – Email from Jane McCallister to Rhonda Larew and others (June 15, 2021)

D795994 - Children's Bureau, CFSR Round 3 Statewide Indicators Workbook (July 2021)

D814024 – Email from Linda Watts to Terry Miller (May 14, 2021)

D814024 – Email from Linda Watts to Terri Miller (May 14, 2021)

D848506 - Email from Linda Watts to Tanny O'Connell, Tina Mitchell, and Terri Miller copying others (December 17, 2020)

D886191 - Email from Terri Walker to Heather Grogg and Tanny O'Connell (August 11, 2020)

D889106 – Email from Shelly Nicewarner to Tanny O'Connell and others, copying Melanie Urquhart and others (December 13, 2019)

D001009955 - Children in Hotels and Hospitals Judicial District Summary Monthly Report for September 1-September 30, 2022

D001010690 - Children in Hotels and Hospitals Judicial District Summary Monthly Report for November 1-November 30, 2022

D001014343 – Email from Carolyn Canini to Cynthia Persily (July 20, 2023)

D001014344 – Attachment to email from Carolyn Canini to Cynthia Persily (July 20, 2023)

D001014348 – Attachment to email from Carolyn Canini to Cynthia Persily (July 20, 2023)

D001020457 - Facilities Youth were in on 11-30-2020 (December 18, 2020)

D001032448 - Facilities Youth were in on 12-31-2020 (January 25, 2021)

D001045723 - Email from Meaghan Goffreda to Michelle Dean, copying Jeffrey Pack and Melanie Urquhart (August 29, 2023)

D001047598 – Email from Michelle Dean to Cammie Chapman, copying Jeffrey Pack, Melanie Urquhart, and others (August 7, 2023)

D001048524 – Marshall University and DHHR, Foster Care Parent Caregivers in West Virginia (August 21, 2023)

D001048754 - BSS DPQI, Greenbrier/Monroe/Pocahontas/Summers Child and Families Services Review (CFSR) Exit Report (June 2, 2023)

D001049700 – Email from Cammie Chapman to Jeffrey Pack and others (April 17, 2023)

D001049702 - Letter from the West Virginia Child Care Association of Child Care Providers to Jeffrey Pack, Cammie Chapman, and other individuals at DoHS (April 17, 2023)

D001049705 – Attachment to email from Cammie Chapman to Jeffrey Pack and others (April 17, 2023)

D001051220 - BSS DPQI, Lewis/Upshur/Braxton District Child and Families Services Review (CFSR) Exit Report (February 3, 2023)

D001051327: Children in Hotels and Hospitals Judicial District Summary Monthly Report for April 1-April 30, 2023

D001054949 - BSS DPQI, Berkeley/Jefferson/Morgan District Child and Families Services Review (CFSR) Exit Report (February 17, 2023)

D001058440 – Email from Cammie Chapman to Susan Richards, copying Jeffrey Pack (June 30, 2023)

D001059218 - Email from Cammie Chapman to Jeffrey Pack and others (June 12, 2023)

D001062695 – DHRR, 2022 Annual Summary Report (February 2023)

D001063046 – Email from Cammie Chapman to Jeffrey Pack and others (February 21, 2023)

D001063047 – Attachment to email from Cammie Chapman to Jeffrey Pack and others (February 21, 2023)

D001063269 – Email from Amanda Gifford to Jeffrey Pack (February 10, 2023)

D001063349 – Email from Jeffrey Pack to Michelle Dean (February 8, 2023)

D001064924 - Email from Jeffrey Pack to Cammie Chapman (November 22, 2022)

D001064993 - Email from Lorie Bragg to Jeffrey Pack (December 15, 2022)

D001064996 – Attachment to email from Lorie Bragg to Jeffrey Pack (December 15, 2022)

D001065329 - Email from Allison Adler to Kendra Boley-Rogers copying Cammie Chapman, Jeffrey Pack, Michelle Dean and others (November 14, 2022)

D001065385 – Email from Bill Crouch to Cammie Chapman, Jeff Pack, and others (December 8, 2022)

D001065386 – Attachment to email from Bill Crouch to Cammie Chapman, Jeff Pack, and others (December 8, 2022)

D001065745 – Email from Susan Richards to Jeffrey Pack, Cammie Chapman, Michelle Dean, and Kendra Boley-Rogers (November 22, 2022)

D001065755 – Email from Susan Richards to Jeffrey Pack, Cammie Chapman, Michelle Dean, and Kendra Boley-Rogers (November 22, 2022)

D001065755 – Attachment to email from Susan Richards to Jeffrey Pack, Cammie Chapman, Michelle Dean, and Kendra Boley-Rogers (November 22, 2022)

D001068317 – Email from Toni Rozanski to Cammie Chapman and Jeffrey Pack (February 7, 2023)

D001068318 – Email from Toni Rozanski to Cammie Chapman and Jeffrey Pack (February 7, 2023)

D001073022 - Email from Jeremiah Samples to Bill Crouch copying others (May 21, 2021)

D001074865 – Email from John Lopez to Pamela Woodman Kaehler, copying Jason Williams and Jeremiah Samples (December 1, 2021)

D001074868 – Letter from Janessa Andrews to Jim Justice (November 26, 2021)

D001076396 - Email from Jeremiah Samples to Jeffrey Pack, Cammie Chapman, and others (August 26, 2021)

D001076458 – Email from Jolynn Marra to Jeremiah Samples (September 2, 2021)

D001076459 – Attachment to email from Jolynn Marra to Jeremiah Samples (September 2, 2021)

D001077525 – Email from Cynthia Persily to Jeremiah Samples (March 24, 2022)

D001139234 – Email from Susan Richards to Rhonda Larew (January 25, 2023)

D001139245 – Attachment to email from Susan Richards to Rhonda Larew (January 25, 2023)

D001148290 – Email from Pamela Woodman-Kaehler to Emily Hopta and DHHR Communications (January 11, 2022)

D001148292 – Attachment to email from Pamela Woodman-Kaehler to Emily Hopta and DHHR Communications (January 11, 2022)

D001138660 - BSS DPQI, Harrison District Child and Families Services Review (CFSR) Exit Report (February 7, 2022)

D001139110 - BSS DPQI, Marshall/Wetzel/Tyler District Child and Families Services Review (CFSR) Exit Report (January 20, 2022)

D001139234 - Email from Susan Richards to Rhonda Larew (January 25, 2023)

D001140508 - BSS DPQI, McDowell District Child and Families Services Review (CFSR) Exit Report (April 5, 2022)

D001142405 - Facilities Youth were in on 8/31/2022 (September 21, 2022)

D001148219 – Email from Cammie Chapman to Bill Crouch and April Robertson, copying Jeff Pack and others (January 23, 2022)

D001157387 - DHHR Office of Inspector General, DHHS Administrative Order/Admissions Ban to ResCare WV (July 13, 2020)

D001167535 - Email from Bill Crouch to Christina Mullins and Jeffrey Pack (December 2, 2021)

D001178750 – Email from Jane McCallister to Thelma Caplinger and Rhonda Larew (August 23, 2021)

D001178752 - DHHR, WV Foster Care Ombudsman Program: The First Year in Review (March 25, 2021)

D001239577 - Children in Hotels and Hospitals Judicial District Summary Monthly Report for December 1-December 31, 2022

D001239581: Children in Hotels and Hospitals Judicial District Summary Monthly Report for October 1-October 31, 2022

D001239598: Children in Hotels and Hospitals Judicial District Summary Monthly Report for August 1-August 31, 2022

D001239604: Children in Hotels and Hospitals Judicial District Summary Monthly Report for February 1-February 28, 2023

D001239617 - Children in Hotels and Hospitals Judicial District Summary Monthly Report for January 1-January 31, 2022

D001239623 - Children in Hotels and Hospitals Judicial District Summary Monthly Report for June 1-June 30, 2022

D001239629 - Children in Hotels and Hospitals Judicial District Summary Monthly Report for January 1-January 31, 2023

D001239662 - Children in Hotels and Hospitals Judicial District Summary Monthly Report for April 1-April 30, 2022

D001239676 - Children in Hotels and Hospitals Judicial District Summary Monthly Report for March 1-March 31, 2023

D001239683 - Children in Hotels and Hospitals Judicial District Summary Monthly Report for March 1-March 31, 2022

D001243087 – DPQI, Fayette County OSRI (December 7, 2023)

D001244961 – DPQI, Brooke/Hancock/Ohio OSRI (December 5, 2023)

D001245270 – DPQI, Randolph/Tucker OSRI (December 5, 2023)

D001245739 – DPQI, Harrison District OSRI (December 5, 2023)

D001246289/D001247274 – DPQI, Marion/Monongalia OSRI (December 7, 2023)

D001246770 – DPQI, Lewis/Upshur/Braxton OSRI (December 7, 2023)

D001246784 – DPQI, Mingo District OSRI (December 7, 2023)

D001250352 – DPQI, Randolph/Tucker OSRI (December 14, 2023)

D001253689 - Email from Eileen Gardner to others (September 11, 2023)

D001253709 – Attachment to email from Eileen Gardner to others (September 11, 2023)

D001264761 - Email from Michelle Dean to Melanie Urquhart, copying Jeffrey Pack (November 16, 2023)

D001265463 - Email from Teresa Berg to Melanie Urquhart (November 28, 2023)

D001265465 - Email from Melanie Urquhart to Teresa Berg, copying others (November 28, 2023)

D001266670 – Attachment to email from Jessica Embrey to Laurea Ellis and Jeffrey Pack (September 11, 2023)

D001362506 – Email from Courtney Rombow to Pamela Woodman Kaehler, Jeffrey Pack, and others (May 3, 2023)

D001362507 – Attachment to email from Courtney Rombow to Pamela Woodman Kaehler, Jeffrey Pack, and others (May 3, 2023)

D001362508 – Attachment to email from Courtney Rombow to Pamela Woodman Kaehler, Jeffrey Pack, and others (May 3, 2023)

D001365717 - Children in Hotels and Hospitals Judicial District Summary Monthly Report for July 1-July 31, 2022

D001377319 – Email from Jeffrey Pack to Cynthia Persily and Cammie Chapman (July 19, 2023)

D001377321 – Attachment to email from Jeffrey Pack to Cynthia Persily and Cammie Chapman (July 19, 2023)

D001377325 – Attachment to email from Jeffrey Pack to Cynthia Persily and Cammie Chapman (July 19, 2023)

D001377933 – Email from Cynthia Persily to Jeffrey Pack and Cammie Chapman (July 21, 2023)

D001377938 – DHHR and WVHEPC, *Title IV-E Payback RoundTable- Child Welfare Workforce* (February 8, 2023)

D001381690 – Email from Kevin Henson to Laura Scarberry (May 22, 2020)

D001422026 – Email from Laurea Ellis to Barry Murphy and more (November 1, 2021)

D001422031 – Open Referrals Over 30 Days Report (October 31, 2021)

D001422033 – Caseworker contact data (November 11, 2021)

D001434002 - Email from Laurea Ellis to Cammie Chapman, and Jeffrey Pack (April 5, 2023)

D001437529 - Letter from Melanie Urquhart to Judge Joanna Tabit Re: Rule to Show Cause (June 8, 2023)

D001443162 - BSS DPQI, Mingo District Child and Families Services Review (CFSR) Exit Report (August 4, 2022)

D001444001 – Email from Bill Crouch to Jeffrey Pack, copying Allison Adler and Cammie Chapman (September 7, 2022)

D001444840 – Jeffrey Pack, The State of Child Welfare in West Virginia (September 13, 2022)

D001445121 – Email from Cammie Chapman to Evan Steel, copying Jeffrey Pack and others (March 20, 2023)

D001445131 – Attachment to email from Cammie Chapman to Evan Steel, copying Jeffrey Pack and others (March 20, 2023)

D001446722 – Email from Jeffrey Pack to Susan Richards (February 21, 2023)

D001446723 – Attachment to email from Jeffrey Pack to Susan Richards (February 21, 2023)

D001461644 – Email from Jeffrey Pack to Bill Crouch, Jeremiah Samples, Cammie Chapman and copying others (October 26, 2021)

D001478761 – Email from Bill Crouch to Cammie Chapman (March 14, 2022)

D001551897 - Totals for Youth in Offices or Hotels Per Month (January 2020)

D001611930 – Email from Tina Mitchell to Cammie Chapman copying Linda Watters (February 9, 2021)

D001618651 - West Virginia University, Workload Study Report (August 19, 2022)

D001680153 – Email from Jessica Holstein to Jeffrey Pack, copying Cammie Chapman and Allison Adler (August 18, 2021)

D001680158 – Attachment to email from Jessica Holstein to Jeffrey Pack, copying Cammie Chapman and Allison Adler (August 18, 2021)

D001680161 – Attachment to email from Jessica Holstein to Jeffrey Pack, copying Cammie Chapman and Allison Adler (August 18, 2021)

D001680184 – Attachment to email from Jessica Holstein to Jeffrey Pack, copying Cammie Chapman and Allison Adler (August 18, 2021)

D001680705 – Email from Cammie Chapman to Bill Crouch, April Robertson, and Jeffrey Pack (June 13, 2022)

D001680867 – Email from April Robertson to Bill Crouch, Jeffrey Pack, and Cammie Chapman (June 22, 2022)

D001680869 – Attachment to email from April Robertson to Bill Crouch, Jeffrey Pack, and Cammie Chapman (June 22, 2022)

D001682553 – Email from Christina Harper to Linda Watts, Bill Crouch and others (January 15, 2019)

D001683289 – Email from Matthew Croft to Bill Crouch, Cammie Chapman, Jeffrey Pack, and others, copying others (May 24, 2022)

D001683291 – Attachment to email from Matthew Croft to Bill Crouch, Cammie Chapman, Jeffrey Pack, and others, copying others (May 24, 2022)

D001683296 – Attachment to email from Matthew Croft to Bill Crouch, Cammie Chapman, Jeffrey Pack, and others, copying others (May 24, 2022)

D001687852 – Children's Bureau, West Virginia Child and Family Services Review Round 3 Program Improvement Plan–Progress Report (May 31, 2023)

D001718072 – Email from Linda Watts to Kathy Szafran, Kimi King, Frant Angotti, and others (October 7, 2020)

D001764443 – Email from Annie Messenger to Cammie Chapman, copying others (November 15, 2023)

D001764444 – Attachment to email from Annie Messenger to Cammie Chapman, copying others (November 15, 2023)

D001764468 – Attachment to email from Annie Messenger to Cammie Chapman, copying others (November 15, 2023)

D001764473 - Email from Laurel Steedman to Cammie Chapman (November 13, 2023)

D001764476 – Attachment to email from Laurel Steedman to Cammie Chapman (November 13, 2023)

D001764484 – Attachment to email from Laurel Steedman to Cammie Chapman (November 13, 2023)

D001770438 - Email from Melanie Urquhart to Cynthia Persily, copying Jeffrey Pack and others (November 17, 2023)

D001770442 - Attachment to email from Melanie Urquhart to Cynthia Persily, copying Jeffrey Pack and others (November 17, 2023)

D001773616 - BSS DPQI, Mason/Jackson/Roane/Calhoun District Child and Families Services Review (CFSR) Exit Report (August 14, 2023)

D001783107 - Email from Susan Richards to Paul Butler (October 17, 2023)

D001783893 – Email from Cynthia Persily to Cammie Chapman, copying April Robertson and Jeffrey Pack (October 15, 2023)

D001784407 - Email from Cammie Chapman to Dawn Frohna (September 8, 2023)

D001786911 – Email from Cammie Chapman to Jessica Holstein (October 31, 2023)

D001786913 – Attachment to email from Cammie Chapman to Jessica Holstein (October 31, 2023)

D001786953 – Attachment to email from Cammie Chapman to Jessica Holstein (October 31, 2023)

D001787012 – Attachment to email from Cammie Chapman to Jessica Holstein (October 31, 2023)

D001790155 – Email from Cynthia Persily to Jeffrey Pack, copying Cammie Chapman and others (October 27, 2023)

D001793532 – Email from Laurea Ellis to Kelly Fletcher and others (September 4, 2023)

D001793534 – CPS/APS/IIU Data on Intake and Investigations

D001794094 – Email from Cammie Chapman to Terri Miller (November 13, 2023)

D001797343 – Email from Jessica Holstein to Jeffrey Pack, copying Cammie Chapman and DHHR Communications (October 23, 2023)

D001797352 - Email from Jeffrey Pack to Jessica Holstein, copying Cammie Chapman (October 16, 2023)

D001797376 – Email from Jeffrey Pack to Susan Richards, Melanie Urquhart, and Cammie Chapman (October 13, 2023)

D001798694 – Email from Jessica Holstein to Cynthia Persily, copying others (October 16, 2023)

D001798702 – Email from Jessica Holstein to Cynthia Persily (October 13, 2023)

D001798712 – Email from Jessica Holstein to Cynthia Persily, copying Whitney Wetzel (October 12, 2023)

D001801114 – Email from Laurea Ellis to Lorie Bragg (October 4, 2023)

D001801117 – Tri County CAC Client Intake notes for [REDACTED] (October 3, 2023)

D001801125 – Tri County CAC Allegations note for [REDACTED] (October 3, 2023)

D001801126/D001801130 – Tri County CAC Case Notes for [REDACTED] (October 3, 2023)

D001801132 – Caseworker sheet noting family background of [REDACTED]
(October 4, 2023)

D001801137 – Tri-County Children’s Advocacy Centers letter disclosing sexual abuse of
[REDACTED] (October 4, 2023)

D001803368 – Email from Jessica Holstein to Cynthia Persily, copying Cammie Chapman,
Jeffrey Pack, and DHHR Communications (November 13, 2023)

D001803391 – Email from Jeffrey pack to Jessica Holstein, copying Cynthia Persily,
Cammie Chapman, and DHHR Communications (November 9, 2023)

D001803593 - Email from Laurea Ellis to Jeffrey Pack (November 3, 2023)

D001804740 – Email from Cynthia Persily to Cammie Chapman (November 11, 2023)

D001805205 – Email from Cammie Chapman to Cynthia Parsons, Lorie Bragg, Melanie
Urquhart, Michelle Dean, Kendra Boley-Rogers, Laurea Ellis, and others, copying
Cynthia Persily, Jeffrey Pack, and others (November 13, 2023)

D1803368 – Email from Jessica Holstein to Cynthia Persily, copying Cammie Chapman,
Jeffrey Pack, and DHHR Communications (November 13, 2023)

D001805207 – Attachment to email from Cammie Chapman to Cynthia Parsons, Lorie
Bragg, Melanie Urquhart, Michelle Dean, Kendra Boley-Rogers, Laurea Ellis, and others,
copying Cynthia Persily, Jeffrey Pack, and others (November 13, 2023)

D001806319 – Email from Cammie Chapman to Cynthia Persily, Jeffrey Pack, and
Christina Mullins (September 11, 2023)

D001806321 – Attachment to email from Cammie Chapman to Cynthia Persily, Jeffrey
Pack, and Christina Mullins (September 11, 2023)

D001806466 – Email from Cammie Chapman to Cynthia Parsons, Lorie Bragg, Melanie
Urquhart, Michelle Dean, Kendra Boley-Rogers, Laurea Ellis, and others, copying
Cynthia Persily, Jeffrey Pack, and others (September 24, 2023)

D001806468 - Attachment to email from Cammie Chapman to Cynthia Parsons, Lorie
Bragg, Melanie Urquhart, Michelle Dean, Kendra Boley-Rogers, Laurea Ellis, and others,
copying Cynthia Persily, Jeffrey Pack, and others (November 13, 2023)

D001807071 – Email from Pamela Woodman Kaehler to Jeffrey pack and others
(November 4, 2023)

D001807088 - Email from Michelle Dean to Jeffrey Pack, copying Lorie Bragg and Laurea
Ellis (October 12, 2023)

D001807490 - Email from Lorie Bragg to Jeffrey Pack, copying others (November 9, 2023)

D001807736 – Email from Cynthia Persily to Riley Keaton (October 27, 2023)

D001807908 – Email from Cynthia Persily to Dawn Frohna (October 23, 2023)

D001807910– Attachment to email from Cynthia Persily to Dawn Frohna (October 23, 2023)

D001808695 - Emails between Jeffrey Pack and Laurea Ellis (November 16, 2023)

D001808874 - Email from Melanie Urquhart to Jeffrey Pack, Michelle Dean, Laurea Ellis, and others (October 23, 2023)

D001809087 – Email from Whitney Wetzel to Jessica Holstein, copying Jeffrey Pack, Cammie Chapman, Cynthia Persily, and others (November 20, 2023)

D001809093 - Email from Jessica Holstein to Cynthia Persily, copying Cammie Chapman, Jeffrey Pack, and others (November 17, 2023)

D001809559 – Email from Jeffrey Pack to Laurea Ellis (October 30, 2023)

D001809650 – Email from Laurea Ellis to Jeffrey Pack (September 11, 2023)

D001809652 – Email from Jessica Embry to Kandy Pudsell copying Lori Williams (November 4, 2022)

D001809687 - Email from Cynthia Persily to Jeremiah Samples (October 16, 2023)

D001809899 - Email from Amanda Gifford to Melanie Urquhart, copying Lorie Bragg and others (November 16, 2023)

D001821675 – Email from Tina Mitchell to Linda Watts (March 1, 2019)

D001820437 – Email from Lance Whaley to Linda Watts and Tina Mitchell (February 20, 2019)

D001820438 – DHHS Case Staffing data (February 20, 2019)

D001821675 – Email from Tina Mitchell to Linda Watts (March 1, 2019)

D001825922 - Email from Tammy Pearson to Linda Watts copying others (March 26, 2019)

D001829067 – Open Referrals Over 30 Days Report (April 4, 2019)

D001836904 – Email from Jolynn Marra to Bill Crouch (June 3, 2019)

D001836905 – Attachment to email from Jolynn Marra to Bill Crouch (June 3, 2019)

D001846443 - Email from Linda Watts to Tanny O’Connell and Tina Mitchell (July 26, 2019)

D001908963 – Email from [REDACTED] and Olivia Frausto (June 8, 2020)

D001923712 – Email from Pamela Woodman Kaehler to Bill Crouch (August 12, 2020)

D001937442 – DHHR, Case Contacts – Summary (November 2023)

D001953865 – Email from Amy Hymes to Melanie Urquhart and Linda Watts (June 27, 2021)

D001953866 – Attachment to email from Amy Hymes to Melanie Urquhart and Linda Watts (June 27, 2021)

D001953893 - Attachment to email from Amy Hymes to Melanie Urquhart and Linda Watts (June 27, 2021)

D001957797 - Email from Marilyn Pearce to Michelle Dean, copying Cammie Chapman, Jeffrey Pack, and others (March 22, 2023)

D001959315 – Email from Jeffrey Pack to Rebecah Carson, copying Cammie Chapman and Marilyn Pearce (February 14, 2023)

D001959343 - Email from Marilyn Pearce to Cammie Chapman, copying Jeffrey Pack and Rebecah Carson (February 13, 2023)

D001962962 – Email from Cammie Chapman to Pamela Woodman Kaehler, Jeffrey Pack, Jeremiah Samples, and others (November 15, 2021)

D001962963 – Attachment to email from Cammie Chapman to Pamela Woodman Kaehler, Jeffrey Pack, Jeremiah Samples, and others (November 15, 2021)

D001974868 - Facilities Youth were in on 05-31-2021 (June 17, 2021)

D001983935 – Email from Sharon Vealey to April Robertson, copying Pamela Woodman Kaehler and others (March 26, 2021)

D001983939 – Attachment to email from Sharon Vealey to April Robertson, copying Pamela Woodman Kaehler and others (March 26, 2021)

D002004934 - Email from Lorie Bragg to Jeffrey Pack and Laurea Ellis (November 8, 2023)

D002141008 - BSS, Child Protective Services Workforce Allocations Calendar Year 2023 (July 1, 2023)

D002211788 – BSS DPQI, Raleigh District Child and Families Services Review (CFSR) Exit Report (March 3, 2022)

D002211811 – BSS DPQI, McDowell District Child and Families Services Review (CFSR) Exit Report (April 5, 2022)

D002211858 - BSS DPQI, Monongalia/Marion District Child and Families Services Review (CFSR) Exit Report (September 23, 2022)

D002211884 – BSS DPQI, Harrison District Child and Families Services Review (CFSR) Exit Report (February 7, 2022)

D002211906 – BSS DPQI, Doddridge/Ritchie/Pleasants District Child and Families Services Review (CFSR) Exit Report (June 13, 2022)

D002211948 – BSS DPQI, Grant/Hardy/Pendleton District Child and Families Services Review (CFSR) Exit Report (September 15, 2022)

D002211983 – BSS DPQI, Brooke/Ohio/Hancock District Child and Families Services Review (CFSR) Exit Report (December 21, 2022)

D002212010 – BSS DPQI, Mingo District Child and Families Services Review (CFSR) Exit Report (August 4, 2022)

D002212033 - BSS DPQI, Kanawha District Child and Families Services Review (CFSR) Exit Report (June 2, 2022)

D002212061 - BSS DPQI, Randolph/Tucker District Child and Families Services Review (CFSR) Exit Report (July 1, 2022)

D002212088 - BSS DPQI, Calhoun, Gilmer, Wirt District Child and Families Services Review (CFSR) Exit Report (January 4, 2023)

D002212132 – BSS DPQI, Lewis/Upshur/Braxton District Child and Families Services Review (CFSR) Exit Report (February 3, 2023)

D002212181 - BSS DPQI, Wayne District Child and Families Services Review (CFSR) Exit Report (January 24, 2022)

D002212196 – BSS DPQI, Cabell District Child and Families Services Review (CFSR) Exit Report (August 31, 2021)

D002212222 – BSS DPQI, Marshall/Wetzel/Tyler District Child and Families Services Review (CFSR) Exit Report (January 20, 2022)

D002212251 – BSS DPQI, Putnam-Mason District Child and Families Services Review (CFSR) Exit Report (February 22, 2021)

D002212274 – BSS DPQI, Boone/Lincoln District Child and Families Services Review (CFSR) Exit Report (May 27, 2021)

D002212317 – BSS DPQI, Hampshire/Mineral District Child and Families Services Review (CFSR) Exit Report (November 9, 2021)

D002212333 – BSS DPQI, Barbour/Taylor/Preston District Child and Families Services Review (CFSR) Exit Report (April 2, 2021)

D002212354 – BSS DPQI, Kanawha District Child and Families Services Review (CFSR) Exit Report (May 5, 2021)

D002212379 – BSS DPQI, Logan District Child and Families Services Review (CFSR) Exit Report (September 16, 2021)

D002212394 – BSS DPQI, Nicholas/Webster District Child and Families Services Review (CFSR) Exit Report (July 8, 2021)

D002212417 – BSS DPQI, Roane/Jackson/Clay District Child and Families Services Review (CFSR) Exit Report (March 2, 2021)

D002212433 – BSS DPQI, Mercer District Child and Families Services Review (CFSR) Exit Report (August 4, 2021)

D002212458 - BSS DPQI, Fayette District Child and Families Services Review (CFSR) Exit Report (March 6, 2023)

D002212479 – BSS DPQI, Kanawha District Child and Families Services Review (CFSR) Exit Report (May 18, 2023)

D002212505 - BSS DPQI, Child and Families Services Review (CFSR) Wood/Wirt Exit Report (December 7, 2023)

D002212528 – BSS DPQI, Greenbrier/Monroe/Pocahontas/Summers Child and Families Services Review (CFSR) Exit Report (June 2, 2023)

D002212557 – BSS DPQI, Wyoming District Child and Families Services Review (CFSR) Exit Report (March 30, 2023)

D002212581 – BSS DPQI, Mason/Jackson/Roane/Calhoun District Child and Family Services Review (CFSR) Exit Report (August 14, 2023)

D002212603 – BSS DPQI, Berkeley/Jefferson/Morgan District Child and Family Services Review (CFSR) Exit Report (February 17, 2023)

D002212648 – BSS DPQI, Mercer District Child and Family Services Review (CFSR) Exit Report (December 5, 2023)

D002212691 - BSS DPQI, Barbour/Preston/Taylor District Child and Families Services Review (CFSR) Exit Report (September 21, 2023)

D002212728 – BSS DPQI, Wayne District Child and Family Services Review (CFSR) Exit Report (October 11, 2023)

D002212750 – BSS DPQI, Cabel District Child and Family Services Review (CFSR) Exit Report (January 18, 2024)

D002212776 - BSS DPQI, Boone, Lincoln, and Putnam District Child and Families Services Review (CFSR) Exit Report (August 2, 2023)

D002228314 – BSS, West Virginia 2021 Annual Progress and Services Review (2021)

D002229214 – BSS, West Virginia 2022 Annual Progress and Services Review (2022)

D002229660 - BSS, West Virginia 2024 Annual Progress and Services Review (2024)

D002230540 - BSS, Foster Care Policy (January 2024)

D002359299 – Email from Bill Crouch to Brian Abraham (July 13, 2020)

D002359301 – Attachment to email from Bill Crouch to Brian Abraham (July 13, 2020)

D002359344 – Attachment to email from Bill Crouch to Brian Abraham (July 13, 2020)

D002359347 – Attachment to email from Bill Crouch to Brian Abraham (July 13, 2020)

D002239552 – Email from Melanie Urquhart to Cammie Chapman, copying Jeffrey Pack (October 3, 2023)

D002372215 – Email from Rita Whittington to others, copying Bill Crouch, Linda Watts, and others (July 13, 2020)

D002372216 – Attachment to email from Rita Whittington to others, copying Bill Crouch, Linda Watts, and others (July 13, 2020)

D002410684 – Email from Jeremiah Samples to Bill Crouch, Linda Watts, and others (July 1, 2019)

D002494125 – Email from Melanie Urquhart to Amanda Spencer, copying Tanny O'Connell (December 6, 2019)

D002742970: Children in Hotels and Hospitals Judicial District Summary Monthly Report for February 1-February 29, 2024

D002742979: Children in Hotels and Hospitals Judicial District Summary Monthly Report for December 1-December 31, 2023

D002742985: Children in Hotels and Hospitals Judicial District Summary Monthly Report for November 1-November 30, 2023

D002779838 - BSS, Bureau for Social Services Recruitment Efforts and Updates (January 9, 2024)

D002779844 - BSS, Bureau for Social Services Recruitment Efforts and Updates (March 20, 2024)

D002779854 - BSS, Bureau for Social Services Recruitment Efforts and Updates (February 13, 2024)

D002845978 – BSS, Regional and Statewide Summary of Vacancies Fiscal Year 2024 (May 8, 2024)

D002845983 – BSS, CPS and YS Vacancy Rates by Judicial District April 2024 (April 30, 2024)

D002236486 – Email from Meaghan Goffreda to Kelley Morris, Patrick Breeden, Michelle O'Bryan, and Caitlin Moore (December 26, 2023)

D002846539 – BSS, Quality of Caseworker Visits (April 10, 2024)

D002851677 - DHHR, Foster Care Policy (August 2020)

D002890323 – Email from Tanny O'Connell to Kathryn Bradley and Shelly Nicewarner, copying Heather Grogg and Melanie Urquhart (December 9, 2019)

D002899246 – Attachment to email from Heather Grogg to Linda Watts and Tanny O'Connell (June 8, 2020)

D002890323 – Email from Tanny O'Connell to Kathryn Bradley and Shelly Nicewarner, copying Melanie Urquhart and Heather Grogg (December 9, 2019)

D002890335 – Safety Cases transferred from Tina to Jessica on 3/17 (2020)

D002902041 – DHHR, 2017 Annual Progress Report (February 2018)

D002919471 - Email from John Lopez to Cynthia Persily, copying others (November 15, 2023)

D002920256 - Face to Face Contact with Child in last 30 Days with Child and Parent/Caregiver (September 15, 2023)

D002920270 - Face to Face Contact with Child in last 30 Days with Child and Parent/Caregiver (September 19, 2023)

D002927278 - Department of Justice Letter to Office of the Governor, State of West Virginia (June 1, 2015)

D003030751 – Jeremiah Samples, Solving West Virginia’s Placement Crisis for Children with Acute Behavioral Issues (June 24, 2022)

D003031922 – Email from Jeffrey pack to Cammie Chapman and others (February 13, 2023)

D003031925 – Attachment to email from Jeffrey pack to Cammie Chapman and others (February 13, 2023)

D003033321 – DHHR, Overdue Safety Plan Data (June 30, 2023)

D003037047 – DHHR, Face to Face Contact with Child in last 30 Days with Child and Parent/Caregiver (August 7, 2023)

D003037280 – DHHR, Face to Face Contact with Child in last 30 Days (July 5, 2023)

D003039665 - Email from Jeremiah Samples to Jeffrey Pack (August 12, 2021)

D003097184 - Agreement Between the State of West Virginia and the United States Department of Justice, Report by Subject Matter Expert (March 2024)

D003097564 - DHHR, WV Child and Family Services Review Program Improvement Plan (2019)

D003096794 - BSS, Bureau for Social Services Recruitment Efforts and Updates (April 19, 2024)

D003105467 – BSS, 2023 Child Protective Services Workforce Allocations (July 1, 2023)

D003105471– BSS, 2022 Child Protective Services Workforce Allocations (July 1, 2021)

D003107531 - BSS, Child Protective Services Policy (June 2024)

D003107870 - BSS, Foster Care Policy (May 2024)

D003112201 - Children’s Bureau, CFSR Round 4 Statewide Indicators Workbook (April 2024)

D003113126 - Children’s Bureau, Child Welfare Outcomes Report Data (2021)

D003113171 – Children's Bureau, CFSR Round 4 Statewide Indicators Workbook (October 2022)

D003113230 - Summary of Responses to Plaintiffs’ Deposition Topics re DoHS Actions to Improve Child Welfare System (n.d.)

D003113462 - DHHR, Worker Workload Monthly History – Summary (July 16, 2024)

D003113469 - DHHR, Children in Hotels and Hospitals Judicial District Summary Monthly Report for March 1 – March 31, 2024 (April 5, 2024)

D003113479 - DHHR, Children in Hotels and Hospitals Judicial District Summary Monthly Report for April 1 – April 30, 2024 (May 7, 2024)

D003113487 - DHHR, Children in Hotels and Hospitals Judicial District Summary Monthly Report for June 1 – June 30, 2024 (July 9, 2024)

D003113494 - DHHR, Children in Hotels and Hospitals Judicial District Summary Monthly Report for May 1 – May 31, 2024 (June 7, 2024)

D003113562 - DHHR, “Children in Placement by Service Description” (July 17, 2024)

D003113569 - DoHS, Children’s Mental Health and Behavioral Health Services Quality and Outcomes Report (July 16, 2024)

D003113835 - DoHS, Children’s Mental Health and Behavioral Health Services Quality and Outcomes Report - Addendum (April 30, 2024)

D003114113 - WV DHHR, Licensure Summary of Findings of Non-Compliance and Plan of Correction (January 11, 2024)

D003114373 – DHHR, Spreadsheet of IIU Investigation Status (July 22, 2024)

D003114619 – BSS, Turnover Analysis Report (May 22, 2024)

D003121913 – Email from Laura Hunt to Kendra Boley-Rogers (March 13, 2024)

D003121916 – Attachment to email from Laura Hunt to Kendra Boley-Rogers (March 13, 2024)

D003129212 - Email from Lorie Bragg to Cory Shipplett, copying Angie Sloan (April 25, 2024)

D003134044 – Email from Matthew Cutright to Matthew Croft and Kristin Showalter (March 13, 2024)

D003138470 – Email from Matthew Croft to Donna White and Stephanie Steward, copying Laureia Ellis and others (April 26, 2024)

D003169221 - Children’s Bureau, CFSR Round 3 Statewide Indicators Workbook (July 2020)

D003169695 – BSS DPQI, Marshall/Wetzel/Tyler District Child and Families Services Review (CFSR) Exit Report (April 8, 2024)

D003169695 – BSS DPQI, Logan/Mingo District Child and Families Services Review (CFSR) Exit Report (February 29, 2024)

D003169744 – BSS DPQI, Braxton, Clay, Gilmer and Webster District Child and Families Services Review (CFSR) Exit Report (March 4, 2024)

D003190707: Children in Hotels and Hospitals Judicial District Summary Monthly Report for January 1-January 31, 2024

D003195305: Totals of Youth in Hotels and Hospitals (2023)

D003200060 – BSS DPQI, Cabell District Child and Families Services Review (CFSR) Exit Report (January 18, 2024)

D003215609: Children in Hotels and Hospitals Judicial District Summary Monthly Report for June 1-June 30, 2023

D003215616: Children in Hotels and Hospitals Judicial District Summary Monthly Report for July 1-July 31, 2023

D003215622: Children in Hotels and Hospitals Judicial District Summary Monthly Report for September 1-September 30, 2023

D003215629: Children in Hotels and Hospitals Judicial District Summary Monthly Report for October 1-October 31, 2023

D003215637: Children in Hotels and Hospitals Judicial District Summary Monthly Report for May 1-May 30, 2023

D003215638: Children in Hotels and Hospitals Judicial District Summary Monthly Report for August 1-August 31, 2023

P05598 - Agnel Phillip, Eli Hager, & Suzy Khimm, The ‘death’ penalty of child welfare: In 6 months, some parents lose their children forever (December 20, 2022)

P07883 – Amelia Ferrell Knisely and Molly Born, *West Virginia’s reliance on out-of-state group homes leaves some foster kids in unsafe, abusive situations* (September 21, 2021)

P010437 - Reducing the Reliance on Residential (R3) Stakeholders Meeting (July 20, 2023)

P10446 - Rolly Hoyt, Some kids have faced violence in Arkansas psychiatric facilities (January 9, 2023)

P10458 - Amelia Ferrell Knisely, State’s plan for reducing foster kids in group homes met with pushback (April 5, 2024)

P10462 - Jacob Geanous, Lawsuits allege widespread sex abuse at juvenile detention centers in Western Pa (July 23, 2024)

Declaration and Expert Report of Samuel Hickman (May 15, 2024)

Declaration and Expert Report of Lisa Prock, MD, MPH (May 15, 2024)

Declaration and Expert Report of Susan Ault (May 17, 2024)

Plaintiffs may offer at trial the following exhibits:

C0051 – Letter from Bill Crouch to Jeremiah Samples (April 7, 2022)

D010397 – DHHR, Document Tracking Screen (November 21, 2009)

D023157 – Uniform Case Plan Report Desk Guide (January 11, 2012)

D035780 – User Guide for the AFCARS Missing Elements Dashboard (September 6, 2018)

D068621 – Email from Laura Barno to Lisa McMullen and Linda Watts (April 26, 2016)

D137153 – Office of Planning, Research Evaluation, Average Caseloads by District (April 10, 2020)

D366736 – Casework contact data (September 6, 2021)

D410970 – DHS, Selected Cases Report (March 19, 2021)

D433609 – Email from Jeremiah Samples to Jeffrey Pack (August 7, 2021)

D414938 – Email from Jeremiah Samples to Jeremiah Samples (September 21, 2021)

D003018201 – Email from Beverly Heldreth to others (August 31, 2021)

D001422029 – Caseworker Visit Status Data (November 1, 2021)

D001422030 – Investigation Workload Distribution Report (October 31, 2021)

D001422032 – Caseworker contact hours (November 11, 2021)

D001663041 – Email from Matthew Christiansen to Legislative Oversight Commission on Health and Human Resources Accountability (June 15, 2022)

D001663222 – Email from Emily Hopta to Allison Adler (June 14, 2022)

D001663223 – Attachment to email from Emily Hopta to Allison Adler (June 14, 2022)

D001500463 – Email from Angela Ferris to Rae Bates (May 12, 2022)

D763534 – Email from Pamela Allen to Bill Crouch (April 19, 2022)

D728605 – Email from Brad McElhinny to Allison Adler (April 11, 2022)

D789243 – Email from Jane McCallister to Rhonda Larew (February 17, 2021)

D001489100 – Email from John Lopez to Bill Crouch, copying others (November 1, 2022)

D001725109 – Email from Gregory Shavers to Linda Watts and copying others (July 7, 2021)

D001806322 – Attachment to email from Cammie Chapman to Cynthia Persily, Jeffrey Pack, and Christina Mullins (September 11, 2023)

D001014658 – Email from Cammie Chapman to Cynthia Persily (July 31, 2023)

D001014660 – Attachment to email from Cammie Chapman to Cynthia Persily (July 31, 2023)

D001046078 - Email from Paula Ullom to Michelle Vaughan, copying Melanie Urquhart, Laurea Ellis, and others (August 28, 2023)

D001058273 – Email from Cammie Chapman to Andrea Ramsey-Mitchell, copying Michelle Dean and Jeffrey Pack (July 21, 2023)

D001058276 – Attachment to email from Cammie Chapman to Andrea Ramsey-Mitchell, copying Michelle Dean and Jeffrey Pack (July 21, 2023)

D001266583 – Email from Jessica Embrey to Jeffrey Pack, copying Laurea Ellis (September 12, 2023)

D001266669 – Email from Jessica Embrey to Laurea Ellis and Jeffrey Pack (September 11, 2023)

D001415882 - Email from Child Welfare Information Getaway Library to Amy Booth (December 17, 2020)

D001437786 – Email from Michelle Dean to Cammie Chapman, copying others (May 31, 2023)

D001804269 – Email from Michelle Dean to Cammie Chapman (October 16, 2023)

D001805630 – Email from Matt Simon to Cynthia Parsons, Cammie Chapman, Jeffrey Pack, Michelle Dean, and others, copying others (October 17, 2023)

D001805632 – Attachment to email from Matt Simon to Cynthia Parsons, Cammie Chapman, Jeffrey Pack, Michelle Dean, and others, copying others (October 17, 2023)

D001805635 – Attachment to email from Matt Simon to Cynthia Parsons, Cammie Chapman, Jeffrey Pack, Michelle Dean, and others, copying others (October 17, 2023)

D001809223 – Email from Cynthia Persily to Jessica Holstein and April Robertson, copying others (October 13, 2023)

D001982741 – Email from Pamela Woodman Kaehler to Emily Hopta, copying DHHR communications (November 9, 2021)

D001982743 – Attachment to email from Pamela Woodman Kaehler to Emily Hopta, copying DHHR communications (November 9, 2021)

D002362474 – Email from Bill Crouch to Jolynn Marra and April Robertson (September 18, 2019)

D002846010 – BSS, BSS ChildStat Summary of Data from Phase 1, August 2023-January 2024 (January 2024)

D002846517 – BSS, Mercer District Case Review, October 2, 2023-March 31, 2024 (March 2024)

Doc 2 of May 14th, 2024 Production of Jeremiah Samples Documents (Part I Jeremiah Samples transcript)

Doc 6 of May 14th, 2024 Production of Jeremiah Samples Documents (Letter from Aaron Allred to Jeff Coben and April Robertson (February 1, 2023))

Doc 11 of May 14th, 2024 Production of Jeremiah Samples Documents (Spreadsheet of DHHR Final Budget SFY2022 and BFY2023)

Doc 12 of May 14th, 2024 Production of Jeremiah Samples Documents (Proposed Legislative Solutions Protecting Mothers and Babies)

Doc 14 of May 14th, 2024 Production of Jeremiah Samples Documents (Jeremiah Samples, Policy Solutions: Solving West Virginia's Workforce Participation Crisis (November 10, 2022))

Doc 15 of May 14th, 2024 Production of Jeremiah Samples Documents (Proposed Reorganization of the West Virginia Department of Health and Human Resources 2018 Regular Legislative Session)

Doc 16 of May 14th, 2024 Production of Jeremiah Samples Documents (Jeremiah Samples, Adulthood After Foster Care: Analysis and Strategies to Improve Outcomes (January 9, 2023))

Doc 17 of May 14th, 2024 Production of Jeremiah Samples Documents (DHHR's Critical Information Report Criteria)

Doc 18 of May 14th, 2024 Production of Jeremiah Samples Documents (Eastern Panhandle Child Protective Service Staffing and Vacancy Con (August 2022))

Doc 22 of May 14th, 2024 Production of Jeremiah Samples Documents Jeremiah Samples, Solving West Virginia's Historical Health Crisis: How genetic screening could improve West Virginia's health care system (n.d.)

Nadine H. et al. v. Murphy et al., 2:99-cv-03678-SRC-CLW, ECF No. 373 (D. N.J.) (June 21, 2022)

Stukenberg et al. v. Abbott et al., 2:11-cv-00084, ECF No. 606 (S.D. Tex.) (Nov. 20, 2018)

Stukenberg et al. v. Abbott et al., 2:11-cv-00084 (S.D. Tex.): ECF No. 869 (June 16, 2020); ECF No. 1079 (May 4, 2021); ECF No. 1165 (January 10, 2022); ECF No. 1248 (June 2, 2022); ECF No. 1318 (January 20, 2023); ECF No. 1380 (June 25, 2023); ECF No. 1496 (January 10, 2024)

Any exhibit used in any deposition conducted in this matter.

The transcript of any deposition in this matter.

Defendants' discovery responses and supplements.

Any document not specifically referenced above but otherwise produced by either party in discovery. Defendants have produced 701,522 documents to Plaintiffs, including thousands of documents in August 2024. Plaintiffs continue to review the documents produced.

Any exhibit or affidavit if needed for impeachment.

Respectfully submitted,

/s/ Marcia Robinson Lowry

Marcia Lowry, *admitted pro hac vice*

mlowry@abetterchildhood.org

Julia K. Tebor, *admitted pro hac vice*

jtebor@abetterchildhood.org

Laura Welikson, *admitted pro hac vice*

lwelikson@abetterchildhood.org

Robyn Goldberg, *admitted pro hac vice*

rgoldberg@abetterchildhood.org

A Better Childhood

355 Lexington Avenue, Floor 16

New York, NY 10017

Tel.: (646) 795-4456

Fax: (212) 692-0415

/s/ J. Alexander Meade

Shaffer & Shaffer, PLLC

Richard W. Walters, WWSB #6809

rwalters@shafferlaw.net

J. Alexander Meade, WVSB #13021

ameade@shafferlaw.net

2116 Kanawha Boulevard, East

P.O. Box 3973

Charleston, WV 25339

Tel: (304) 344-8716

Fax: (304) 344-1481

/s/ Andrew Castillo

Disability Rights of West Virginia

Andrew Castillo, WVSB #14358

acastillo@drofwv.org

1207 Quarrier Street, Suite 400

Charleston, WV 25301

Tel: (304) 346-0847

Fax: (304) 346-0687

Attorneys for Plaintiffs